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***Attorneys for Plaintiff***  
***Entropic Communications, LLC***

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

DISH Network Corporation, *et al.*,

Defendants.

Case No.: 2:23-cv-01043-JWH-KES

**JOINT STATUS REPORT RE  
CONSOLIDATION AND  
APPOINTMENT OF SPECIAL  
MASTER RE DISCOVERY**

Hearing Date: June 9, 2023  
Hearing Time: 11:00 a.m.  
Courtroom: 9D (Santa Ana)  
Judge: Hon. J. W. Holcomb

1 Plaintiff Entropic Communications, LLC (“Plaintiff” or “Entropic”), and  
2 Defendants DISH Network Corporation, DISH Network L.L.C., Dish Network  
3 Service, L.L.C., and Dish Network California Service Corporation (collectively  
4 “Defendants”) (jointly with Plaintiff, the “Parties”) hereby submit the following  
5 Joint Status Report pursuant to the Court’s May 17, 2023 Scheduling Notice and  
6 Order [ECF Dkt. No. 55] directing the Parties to file an update regarding case  
7 consolidation and the appointment of a Special Master.

## 8 **I. THE PARTIES’ POSITION REGARDING CONSOLIDATION**

9 With respect to consolidation, the Parties reiterate their respective positions  
10 stated in the March 10, 2023 Joint Response to Order to Show Cause Regarding  
11 Consolidation [ECF Dkt. No. 26], whereby the Parties agreed, for pretrial purposes,  
12 to consolidate Case Nos. 2:23-cv-01048-JWH-KES, 2:23-cv-01043-JWH-KES, and  
13 2:23-cv-01047-JWH-KES through the *Markman* hearing. Since that time,  
14 Defendants DISH Network Corporation, DISH Network L.L.C., and Dish Network  
15 Service L.L.C. have filed a motion to dismiss pursuant to Rule 12(b)(3), and the  
16 Parties agree that the agreement to consolidate is without waiver and without  
17 prejudice to that pending motion to dismiss [ECF Dkt. No. 49]. In the interim, the  
18 Parties are continuing to meet and confer with specific proposals for some  
19 consolidated discovery and potentially other issues, with another meet and confer on  
20 this issue to be held at the time of their Rule 26 conference of counsel in the coming  
21 week(s). The Parties will be working cooperatively to agree on the specific features  
22 of consolidation and intend to submit a proposed order regarding consolidation in  
23 connection with or near the time of their filing of their Rule 26 Joint Report.

## 24 **II. THE PARTIES’ POSITION REGARDING SPECIAL MASTER** 25 **APPOINTMENT**

26 With respect to the appointment of a Special Master to handle discovery  
27 disputes, the Parties reiterate their agreement to appoint David Keyzer as Special  
28

1 Master as represented to the Court during the April 21, 2023 Show Cause Hearing  
2 [ECF 52]. The Parties will file a draft proposed order appointing David Keyzer as  
3 the Special Master presiding over the instant dispute as soon as the Parties receive  
4 Keyser's executed declaration confirming that he has run and cleared conflicts.  
5  
6

7 Dated: May 26, 2023

Respectfully Submitted,

8 **K&L GATES LLP**

9 By: /s/ Christina N. Goodrich

10 Christina Goodrich

11 Connor J. Meggs

12 Attorneys for Plaintiff Entropic  
Communications, LLC  
13

14 Dated: May 26, 2023

15 **FISH & RICHARDSON P.C.**

16 By: /s/Christopher S. Marchese  
Christopher S. Marchese

17  
18 Attorney for Defendants  
DISH Network Corporation;  
19 DISH Network L.L.C.; Dish Network  
Service L.L.C.; and  
20 Dish Network California Service  
Corporation  
21

22 **SIGNATURE CERTIFICATION**

23 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest  
24 that all other signatories listed above concur in this filing's content and have  
25 authorized the filing.  
26

27 /s/ Christina N. Goodrich  
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